

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PAUL O'BEIRNE, an individual,

Plaintiff,

v.

TROY STAFFORD, an individual,

Defendant.

No. 2:15-cv-01330-RSL

DECLARATION FOR PERSONAL
SERVICE OUT OF STATE

Jeremy E. Roller declares as follows:

1. I am a member of Yarmuth Wilsdon PLLC, counsel for plaintiff Paul O'Beirne ("O'Beirne") in the above-captioned lawsuit. I make this declaration upon personal knowledge and, if called to testify, could and would testify competently to the facts set forth herein.

2. O'Beirne has filed this lawsuit against defendant Troy Stafford ("Stafford") for breach of contract.

3. O'Beirne's complaint alleges that Stafford is subject to the jurisdiction of this Court as provided in RCW 4.28.185 because Stafford has transacted business within Washington State and has committed tortious acts within this state. *See* Complaint ¶ 4.



4. Personal service on Stafford within Washington State cannot be made because Stafford does not reside and is not currently present in Washington State.

I declare under penalty of perjury that the foregoing is true and correct.

DATED September 15, 2015.

/s/ Jeremy Roller

Jeremy Roller

CERTIFICATE OF SERVICE

I hereby certify that on this date, I placed in the U.S. Mail, postage prepaid, a copy of the foregoing document addressed to the following:

Troy Stafford
1603 Cottonwood Valley Circle N.
Irving, Texas 75038

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED: September 15, 2015 at Seattle, Washington.

/s/ Sue Stephens
Sue Stephens, Legal Assistant

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